

# **EXHIBIT 151**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, ET AL., )  
)  
Plaintiffs, )  
)  
vs. ) CIVIL ACTION NO.  
)  
BRAD RAFFENSPERGER, ET ) 1:17-CV-2989-AT  
AL, )  
)  
Defendants. )

VIDEOTAPED 30(b)(6) DEPOSITION OF ERIC B. CHANEY  
(Taken by Plaintiffs)  
August 15, 2022  
10:20 a.m.

Reported by: Debra M. Druzisky, CCR-B-1848

1 Q. Okay. So Exhibit 4 is an official summary  
2 from the Secretary of State's office about an  
3 investigation involving Coffee County; is that  
4 fair?

5 A. Yes.

6 Q. And what involvement, if any, did you have  
7 with this investigation?

8 A. None that I recall.

9 Q. So did anybody from the State interview  
10 you as a member of the board?

11 A. Not that I recall.

12 Q. Did anyone from the State provide a report  
13 to any -- to you as a member of the board other  
14 than what's written here?

15 A. Not that I recall.

16 Q. Okay. So if we look at Exhibit 4, look at  
17 complaint two on Page 1. Do you see that?

18 A. I do.

19 Q. And it reads:

20 "A video surfaced on YouTube where  
21 it showed Coffee County election  
22 supervisor Misty Martin discussing the  
23 ways in which the election software  
24 could be manipulated."

25 Do you see that?

1 A. I do.

2 Q. And Misty Martin is the same person as  
3 Misty Hampton?

4 A. Yes.

5 Q. Okay. So we're talking about the, at this  
6 time, the Coffee County election supervisor; right?

7 A. Yes.

8 Q. Okay. And are you familiar with that  
9 YouTube video?

10 A. Yes.

11 Q. You filmed that video; right?

12 A. Fifth Amendment.

13 Q. The video that's referenced there, that  
14 was filmed during an official meeting of the Coffee  
15 County election board in the Coffee County  
16 office -- election office; right?

17 A. Fifth Amendment.

18 Q. All right. Turn to the third page, if you  
19 would. Do you see where it has Findings at the  
20 top?

21 A. Yes, sir.

22 Q. And then Complaint Two referencing that  
23 same complaint. Do you see that?

24 A. Yes.

25 Q. And under the findings here, the State

1 reports:

2 "Ms. Martin, along with Coffee  
3 County Board of Election member Eric  
4 Chaney, made two videos claiming the  
5 Dominion system election software  
6 could be manipulated."

7 Do you see that?

8 A. I do.

9 Q. Do you disa -- dispute that finding?

10 A. Fifth Amendment.

11 Q. It then goes on, if you come to the third  
12 sentence, four lines down in the middle, do you see  
13 where it reads, "Ms. Martin never"?

14 A. I do.

15 Q. And it -- and the finding here is:

16 "Ms. Martin never once during the  
17 videos explained the intended use of  
18 the adjudication process.

19 "The video was very misleading and  
20 seemed its purpose was simply to  
21 create doubt and public mistrust in  
22 the Dominion Voting System."

23 Do you see that?

24 A. Yes.

25 Q. Was it your purpose in creating this video

1 A. I don't recall.

2 Q. Was it another member of the board?

3 A. There again, I don't recall.

4 Q. Was it counsel for the board, like, Tony  
5 Rowell?

6 A. I do not recall.

7 Q. Where is that video surveillance today?

8 A. I do not know.

9 Q. Would it surprise you to learn that Coffee  
10 County claims it doesn't exist?

11 A. There again, I don't know.

12 Q. Did that video surveillance cover the  
13 month of January 2021?

14 A. I don't know.

15 Q. You don't recall whether you viewed any  
16 video surveillance from the elections county office  
17 from January of 2021?

18 A. I do not.

19 Q. As a former member of the board, do you  
20 have any inside information into why that video  
21 surveillance would have been destroyed?

22 A. Fifth Amendment.

23 Q. Do you recall that, in that meeting on --  
24 in February of 2021, that Ms. Hampton showed up  
25 with a letter of resignation in an envelope?

1 Mr. Lindell as associated with former President  
2 Trump?

3 A. Bits and pieces, I have.

4 Q. When was Mr. Lindell in the Coffee County  
5 election office?

6 A. To my knowledge, he's never been in the  
7 elections office.

8 Q. You're not aware of Mr. Lindell being in  
9 Coffee County in around February, late February or  
10 early March 2021?

11 A. No, sir.

12 Q. What about Doug Logan?

13 A. No recollection of the name.

14 Q. You're not aware of Doug Logan being in  
15 the Coffee County election office?

16 A. No.

17 Q. What about Paul Maggio?

18 A. I don't recognize the name.

19 Q. Not aware of him in that office?

20 A. Not that I'm aware of.

21 Q. What about Chris -- sorry. What about  
22 Scott Hall?

23 A. I don't know the name.

24 Q. Not aware of him in that office?

25 A. No, sir.

1 Q. Do you know Robert Sinners?

2 A. I know the name.

3 Q. Who is that?

4 A. Just an attorney in the -- I know the name  
5 of Robert Sinners, but I don't know Robert Sinners.

6 Q. He works for the Secretary of State's  
7 office; right?

8 A. No idea.

9 Q. You don't know Robert Sinners who started  
10 working for the Secretary of State's office in  
11 20 -- February of 2021?

12 A. I do not.

13 Q. Is there a reason why you have his phone  
14 number?

15 A. As I said, I don't know Robert Sinners. I  
16 knew he's an attorney, but I don't -- past that, I  
17 don't know Robert Sinners.

18 Q. Okay. All right. Look at the meeting  
19 minutes from June 8th, 2021.

20 A. Okay.

21 Q. I'm sorry. Before we turn to that, the  
22 video surveillance that you reviewed when  
23 Ms. Hampton was asked to resign, did you see in any  
24 of that video anyone in the Coffee County elections  
25 office that wasn't supposed to be there?

1           A.     Fifth Amendment.

2           Q.     Was that something that was discussed with  
3 other members of the board or counsel?

4           A.     Fifth Amendment.

5           Q.     All right. Take a look at the June 8,  
6 2021 minutes. Do you recall this board meeting?

7           A.     Not specifically, I do not. No, sir.

8           Q.     Do you recall Mr. Barnes reporting to you  
9 or anyone else on the board at any meeting that the  
10 Secretary of State's office had come in and taken  
11 the E.M.S. server and the I.C.C. that had been in  
12 Coffee County?

13          A.     I vaguely remember some discussion of  
14 that, but I don't remember any specific  
15 information.

16          Q.     Tell me what you remember about that.

17          A.     First of all, the terms "I.C.C. scanner"  
18 and -- I mean, all the -- that really doesn't --  
19 that doesn't ring a -- you know, I don't even know  
20 what that is, per se.

21                 He just made mention that something was --  
22 some of the equipment wasn't working, he contacted  
23 the Secretary of State's office, as I recall, and  
24 they had come -- I think, if I remember correctly,  
25 they come down, they couldn't get it to work or

1 A. Yes, sir.

2 Q. And there are three screenshots of poll  
3 pads, three photos of poll pads that Ms. Hampton  
4 sent you. Do you see that?

5 A. Yes.

6 Q. And on the first one she shows that the  
7 poll pad is accessing Netflix; right?

8 A. Yes.

9 Q. And on the second one, she shows that the  
10 poll pad is accessing, what is she -- what is that?  
11 Do you know what that is? Some sort of games?

12 MR. DELK: Object to the form.

13 THE WITNESS: I'm not sure.

14 BY MR. CROSS:

15 Q. One of the things that Ms. Hampton had  
16 raised as a concern with you and others was that  
17 the poll pads used in Georgia are connected to the  
18 Internet; right?

19 A. That's correct.

20 Q. And you're aware that -- well, back up.

21 Ms. Hampton's daughter also worked for the  
22 County; right?

23 A. She did.

24 Q. She helped with elections?

25 A. She was employed part-time with the

1 County.

2 Q. And you're aware that, during at least one  
3 election, Ms. Hampton's daughter was able to use a  
4 poll pad to watch Netflix during the election;  
5 right? Ms. Hampton conveyed that to you?

6 A. Fifth Amendment.

7 Q. Then if you come down to the bottom,  
8 there's still -- just so you can see, we're still  
9 on December 30 of 2020. That spills over to the  
10 top of Page 20, and there's an additional photo.

11 So this is still December 30. Do you see  
12 that?

13 A. Yes.

14 Q. And there's a card game that's depicted on  
15 a computer screen in that one; right?

16 A. Yes.

17 Q. And here Ms. Hampton wrote to you:

18 "This is the computer that the  
19 I.C.C. scanner is connected to."

20 Right?

21 MR. DELK: Object to the form.

22 THE WITNESS: Fifth Amendment.

23 BY MR. CROSS:

24 Q. And then she sends you another photo. Do  
25 you see that below?

1 A. Yes.

2 Q. And there she writes:

3 "This is the E.M.S. server  
4 computer."

5 Do you see that?

6 A. Fifth Amendment.

7 Q. Then on December 31 of 2020 at 7:46 p.m.,  
8 you wrote to her:

9 "Did you get the letter sent?"

10 Do you see that?

11 A. Yes.

12 Q. What letter?

13 A. Fifth Amendment.

14 Q. Sent to whom?

15 A. Fifth Amendment.

16 Q. About what?

17 A. Fifth Amendment.

18 Q. For what purpose?

19 A. Fifth Amendment.

20 Q. Who wrote it?

21 A. Fifth Amendment.

22 Q. What was your involvement?

23 A. Fifth Amendment.

24 Q. Who else was involved?

25 A. Fifth Amendment.

1       bullets that continue on to the top of the next  
2       page?

3           A.     I do.

4           Q.     Are you aware of any communication by the  
5       Secretary's office to the Coffee County election  
6       board or anyone with responsibility for Coffee  
7       County elections to ensure that any of these  
8       mitigation measures were taken?

9           A.     I'm not personally aware.

10          Q.     Are you aware of any effort by Coffee  
11       County to implement these mitigation measures?

12               MR. DELK:   Object to the form.

13               THE WITNESS:   I'm not aware.

14       BY MR. CROSS:

15          Q.     And you're not aware that anybody ever  
16       told anyone at Coffee County they needed to  
17       implement these measures; right?

18          A.     I'm not personally aware, no, sir.

19          Q.     And as a member of the Coffee County  
20       election board, if mitigation measures as serious  
21       as those here were being implemented in the county,  
22       you would expect to have received a report on that  
23       as a member of the board; right?

24               MR. DELK:   Object to the form.

25               THE WITNESS:   Can you state that

1           R E P O R T E R     C E R T I F I C A T E  
2     STATE OF GEORGIA )  
3     COBB COUNTY        )

4           I, Debra M. Druzisky, a Certified Court  
5     Reporter in and for the State of Georgia, do hereby  
6     certify:

7           That prior to being examined, the witness  
8     named in the foregoing deposition was by me duly  
9     sworn to testify to the truth, the whole truth, and  
10    nothing but the truth;

11          That said deposition was taken before me  
12    at the time and place set forth and was taken down  
13    by me in shorthand and thereafter reduced to  
14    computerized transcription under my direction and  
15    supervision. And I hereby certify the foregoing  
16    deposition is a full, true and correct transcript  
17    of my shorthand notes so taken.

18          Review of the transcript was requested.  
19    If requested, any changes made by the deponent and  
20    provided to the reporter during the period allowed  
21    are appended hereto.

22          I further certify that I am not of kin or  
23    counsel to the parties in the case, and I am not in  
24    the regular employ of counsel for any of the said  
25    parties, nor am I in any way financially interested  
26    in the result of said case.

27          IN WITNESS WHEREOF, I have hereunto  
28    subscribed my name this 18th day of August, 2022.

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